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Attorneys for Defendant,

TRBC Ministries, LLC

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAVOY SENIOR HOUSING CORPORATION)

and)

SAVOY LIBERTY VILLAGE, LLC)

Plaintiffs,)

v.)

TRBC MINISTRIES, LLC)

Defendant.)

Civil Action

File No.: 8874/2008

NOTICE OF MOTION

TO: David C. Wrobel, Esq.
Wrobel & Schatz, LLP
1040 Avenue of the Americas
11th Floor
New York, NY 10018
Attorneys for Plaintiffs,
Savoy Senior Housing Corporation and
Savoy Liberty Village, LLC

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, the undersigned attorneys for Defendant, TRBC Ministries, LLC ("TRBC") shall appear before the Honorable Colleen McMahon, U.S.D.J. at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an order dismissing the Complaint of Plaintiffs, Savoy Senior Housing Corporation and Savoy Liberty Village, LLC

("Plaintiffs"), in this matter for lack of jurisdiction, or, in the alternative, to transfer this matter to the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that in support of the within motion to dismiss or transfer, TRBC shall rely upon the Legal Memorandum, and Certification of Counsel submitted herewith, together with all pleadings and proceedings to date.

PLEASE TAKE FURTHER NOTICE that, pursuant to FED. R. CIV. P. 78, oral argument is requested if opposition to the within motion is filed by or on behalf of Plaintiffs.

MCELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP
Attorneys for Defendant,
TRBC Ministries, LLC

By: /s/ Scott S. Flynn
Scott S. Flynn (SF 7469)
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of October, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ Scott S. Flynn
Scott S. Flynn, Esq. (SF7469)